

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NORTH DAKOTA

In re:
Pro-Mark Services, Inc.,
Debtor.

Chapter 7
Bky. No. 24-30167

**MOTION FOR ADMISSION PRO HAC VICE OF
CARLOS A. ALONSO GAYON**

The undersigned, Carlos A. Alonso Gayon, moves the Court pursuant to Local Rule 9010-2(B) for leave to appear *pro hac vice* for the purpose of representing Erik A. Ahlgren, in his capacities as chapter 7 trustee of the bankruptcy estate of Pro-Mark Services, Inc., as plan administrator of the Pro-Mark Services, Inc. Employee Stock Ownership Plan, and as trustee of the Pro-Mark Services, Inc. Employee Stock Ownership Trust (referred to together under all of these capacities as “Trustee”), in the above-captioned bankruptcy case and all related adversary proceedings, including, without limitation, Adv. No. 24-07014 (“Motion”).

In support of the Motion, the undersigned submits the following information for consideration by the Court:

1. I am an attorney admitted to practice before the courts of the State of Minnesota and am an associate at Greenberg Traurig, LLP (“Greenberg”). I am counsel to Trustee in the above-captioned bankruptcy case. By order dated September 16, 2024 [ECF No. 125], the Court approved the Trustee’s retention of Greenberg as counsel.

2. I maintain an office at 90 S. 7th St., Suite 3500, Minneapolis, MN 55402. My telephone number is (612) 259-9674. My email address is carlos.alonsogayon@gtlaw.com.

3. I am a member in good standing of the Bar of the State of Minnesota. A Certificate of Good Standing from the Bar of the State of Minnesota is attached hereto as Exhibit A. I am also admitted to practice before the United States District Court for the District of Minnesota.

4. I am aware of and acknowledge that I am subject to all applicable provisions of the North Dakota Rules of Professional Conduct and the Local Rules, and if admitted *pro hac vice*, will adhere to the disciplinary jurisdiction of this Court.

5. I have never been and am not presently subject to any disciplinary proceedings.

6. Payment of the \$150.00 admission fee is being made with this filing through the Court's online automated payment system.

7. Under penalty of perjury, I declare that the above information is true, correct, and complete, to the best of my knowledge and belief.

WHEREFORE, Carlos A. Alonso Gayon respectfully requests that the Court grant the Motion.

GREENBERG TRAURIG, LLP

Dated: October 2, 2024

/e/ Carlos A. Alonso Gayon

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and

Erik A. Ahlgren (North Dakota #09561)
Ahlgren Law Office, PLLC
220 W. Washington Ave. Suite 105
Fergus Falls, MN 56537
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Email: erik@ahlgrenlawoffice.net

Counsel for Erik A. Ahlgren, as Chapter 7 Trustee of Bankruptcy Estate of Pro-Mark Services, Inc., as Plan Administrator of the Pro-Mark Services, Inc. Employee Stock Ownership Plan, and as Trustee of the Pro-Mark Services, Inc. Employee Stock Ownership Trust

CERTIFICATE OF SERVICE

I hereby certify that on October 2, 2024, I electronically filed the foregoing **Motion for Admission Pro Hac Vice of Carlos A. Alonso Gayon** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all parties of record.

/e/ Carlos A. Alonso Gayon

Carlos A. Alonso Gayon (Minnesota #0504548)
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Minneapolis, MN 55402
Telephone: (612) 259-9700
Email: carlos.alonsogayon@gtlaw.com

EXHIBIT A

**STATE OF MINNESOTA
IN SUPREME COURT**

Certificate of Good Standing

This is to certify that the following lawyer is in good standing

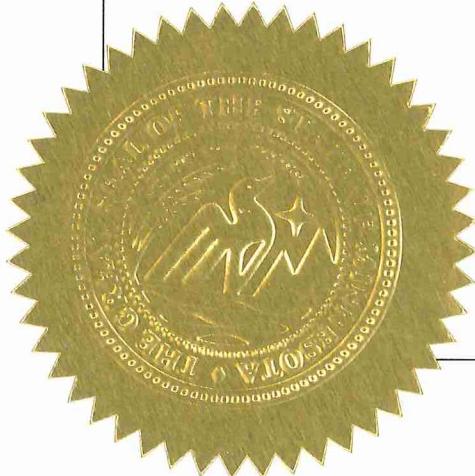
Carlos Andres Alonso Gayon

was duly admitted to practice as a lawyer and counselor at law in all the courts of this state on

October 27, 2023

Given under my hand and seal of this court on

September 24, 2024



Emily J. Eschweiler

Emily J. Eschweiler, Director
Office of Lawyer Registration